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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MAR 12 2008  
Mar 12 2008 MB  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

Gregory Champion

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 07C7267  
(To be supplied by the Clerk of this Court)

Sheriff Deputy Parks  
Sheriff Deputy King

Pallmeyer

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

- X 2nd AMENDED  
COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)
- \_\_\_\_\_  
COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)
- \_\_\_\_\_  
OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: GREGORY CHAMPION
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: 20060080031
- D. Place of present confinement: COOK COUNTY JAIL
- E. Address: 2700 S. CALIFORNIA

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: PARKS
- Title: CCDOC SHERIFF DEPUTY
- Place of Employment: COOK COUNTY JAIL
- B. Defendant: KING
- Title: CCDOC SHERIFF DEPUTY
- Place of Employment: COOK COUNTY JAIL
- C. Defendant: \_\_\_\_\_
- Title: \_\_\_\_\_
- Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: CHAMPION V DAHLQUIST  
07C1373
- B. Approximate date of filing lawsuit: 03/07
- C. List all ~~plaintiffs~~ <sup>defendants</sup> (if you had ~~any~~), including any aliases:  
C.P.D. Root #16311, Philip Cline CHGO, Police Department  
CITY OF CHICAGO, Ronald DAHLQUIST
- D. List all ~~defendants~~ <sup>plaintiffs</sup>: GREG CHAMPION
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District
- F. Name of judge to whom case was assigned: Castillo
- G. Basic claim made: false arrest, 14th Amendment
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Pending
- I. Approximate date of disposition: \_\_\_\_\_

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

- A. NAME OF CASE AND DOCKET NUMBER CHAMPION V Eagle Printing  
07c1702
- B. APPROXIMATE DATE OF FILING ? 04/07
- C. LIST ALL PLAINTIFFS.  
Gregory Champion
- D. LIST ALL DEFENDANTS.  
Frank Roslowski  
Kevin Roslowski
- E. COURT IN WHICH THE LAWSUIT WAS FILED  
Northern District
- F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
Castillo
- G. BASIC CLAIM MADE.  
Unjust Firing
- H. DISPOSITION OF THIS CASE.  
Dismissed
- I. DATE OF DISPOSITION

05/07

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

A. NAME OF CASE AND DOCKET NUMBER CHAMPION V GODINEZ  
07C 4852

B. APPROXIMATE DATE OF FILING ? 08/07

C. LIST ALL PLAINTIFFS.  
~~GREGORY~~ GREGORY  
~~CHAMPION~~ CHAMPION

D. LIST ALL DEFENDANTS.

GODINEZ  
John Delia  
Thomas DART

E. COURT IN WHICH THE LAWSUIT WAS FILED  
Northern DISTRICT

F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
Pallmeyer

G. BASIC CLAIM MADE.  
4 Amendment illegal Search & Seizure

H. DISPOSITION OF THIS CASE.  
DISMISSED

I. DATE OF DISPOSITION  
08/07

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

- A. NAME OF CASE AND DOCKET NUMBER *CHAMPION V GONIAVEZ*  
*07C 6070*
- B. APPROXIMATE DATE OF FILING ? *10/07*
- C. LIST ALL PLAINTIFFS.  
*Gregory Champion*
- D. LIST ALL DEFENDANTS.  
*Victoria Furlow*  
*A. TING*
- E. COURT IN WHICH THE LAWSUIT WAS FILED  
*Northern DISTRICT*
- F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
*Pallmeyer*
- G. BASIC CLAIM MADE.  
*Deliberate indifference To Severe MEDICAL Need*
- H. DISPOSITION OF THIS CASE.  
*Pending*
- I. DATE OF DISPOSITION

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

- A. NAME OF CASE AND DOCKET NUMBER *CHAMPION V DART*  
*07c6414*
- B. APPROXIMATE DATE OF FILING ? *11/07*
- C. LIST ALL PLAINTIFFS.  
*Gregory Champion*
- D. LIST ALL DEFENDANTS.  
*C.P.D, officer Delia #20736*  
*C.P.D, officer Hoffman (Belmont/Western) DISTRICT*
- E. COURT IN WHICH THE LAWSUIT WAS FILED  
*Northern District*
- F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
*Pallmeyer*
- G. BASIC CLAIM MADE.  
*false arrest*
- H. DISPOSITION OF THIS CASE.  
*pending*
- I. DATE OF DISPOSITION

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

A. NAME OF CASE AND DOCKET NUMBER *Champion v DART*  
*07C 7267*

B. APPROXIMATE DATE OF FILING ? *12/07*

C. LIST ALL PLAINTIFFS.  
*Gregory CHAMPION*

D. LIST ALL DEFENDANTS.  
*Sheriff Deputy KING*  
*Sheriff Deputy Ms. PARKS*

E. COURT IN WHICH THE LAWSUIT WAS FILED  
*Northern DISTRICT*

F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
*Pallmeyer*

G. BASIC CLAIM MADE.  
*Failure To Protect*

H. DISPOSITION OF THIS CASE.  
*Pending*

I. DATE OF DISPOSITION



LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

- A. NAME OF CASE AND DOCKET NUMBER *Champion v Devine*  
*08C0022*
- B. APPROXIMATE DATE OF FILING ? *12/07*
- C. LIST ALL PLAINTIFFS.  
*Gregory Champion*
- D. LIST ALL DEFENDANTS.  
*Dick Devine*  
*John Delin*  
*CITY of CHICAGO*  
*Godinez*
- E. COURT IN WHICH THE LAWSUIT WAS FILED  
*Northern DISTRICT*
- F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
*Pallmeyer*
- G. BASIC CLAIM MADE.  
*Illegal Search & Seizure*
- H. DISPOSITION OF THIS CASE.  
*Dismissed*
- I. DATE OF DISPOSITION

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On 12/04/07, circa 2:00 P.M., Plaintiff Champion was lying on his bed in Medical Dormitory, minimum security tier N, dorm 2, reading legal materials. Maximum security, habitual criminal, gang leader, detainee Floyd King, walked over & punched Plaintiff in his right eye socket, breaking glasses & impairing his vision. Plaintiff ran to guards station, frantically telling deputy's Parks & King that detainee King had assaulted him, causing great bodily harm to his eye. Ms. Parks laughed that, "that's why he hit me, because I talk too much." I reminded her of her duty to protect & that she was liable to a civil suit for failure to protect, she ~~of~~ scoffed at me to sit down & continued to ridicule me. Deputy King came over & admonished me "not to address the officer Parks in that tone, do not threaten her with lawsuit." Only then was detainee King told to pack up, he was sent upstairs to "Tough guys deck". I was taken to medical dispensary, my eye was examined, I was given Motrin, & told to take it easy.

a couple of days later, detainee King & I were called to an administration hearing, Deputy King told me to wait outside, Lt. Martinez interviewed detainee King, & did not even file charges against him. King was simply moved to Room ① where he currently remains. I asked the Lt. did she need to hear my statement, she snapped No !! Detainee King is lifelong habitual criminal who never<sup>oo</sup> should have been in minimum security medical tier in the first place. His record will corroborate my statement.

Deputy Ms. Parks & Deputy King, at all times acting under color of state law, willfully failed to protect me from this dangerous, insane detainee, Lloyd King. My constitutional rights were deprived of me.

The officers refused to press charges against detainee, obviously feeling Plaintiff deserved to be "shut up," as was Ms. Parks inference !!  
oo

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want both deputies liable for monetary damages and  
I want County Jail to not put me in situation where  
My safety will be in jeopardy!!

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 6 day of March, 2008

Gregory L. Champion  
(Signature of plaintiff or plaintiffs)

GREGORY CHAMPION  
(Print name)

20060080031  
(I.D. Number)

1419 Woodhollow Ln  
Flossmoor IL. 60422  
(Address)